

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TAASERA LICENSING LLC,)	Case No. 2:21-cv-00441-JRG-RSP
)	
Plaintiff,)	<u>JURY TRIAL DEMANDED</u>
)	
v.)	
)	
TREND MICRO INCORPORATED,)	
)	
Defendant.)	

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Pursuant to the Court’s Docket Control Order dated August 3, 2022 (Dkt. 17), Plaintiff Taasera Licensing LLC (“Plaintiff” or “Taasera”) and Defendant Trend Micro Incorporated (“Defendant” or “Trend Micro”) have met and conferred and hereby jointly request that the Court enter the proposed Protective Order, attached hereto as Exhibit A.

Dated: August 9, 2022

Respectfully submitted,

/s/ Alfred R. Fabricant
Alfred R. Fabricant
NY Bar No. 2219392
Email: ffabricant@fabricantllp.com
Peter Lambrianakos
NY Bar No. 2894392
Email: plambrianakos@fabricantllp.com
Vincent J. Rubino, III
NY Bar No. 4557435
Email: vrubino@fabricantllp.com
FABRICANT LLP
411 Theodore Fremd Avenue,
Suite 206 South
Rye, New York 10580
Telephone: (212) 257-5797
Facsimile: (212) 257-5796

Justin Kurt Truelove

Texas Bar No. 24013653
Email: kurt@truelovelawfirm.com
TRUELOVE LAW FIRM, PLLC
100 West Houston Street
Marshall, Texas 75670
Telephone: (903) 938-8321
Facsimile: (903) 215-8510

**ATTORNEYS FOR PLAINTIFF
TAASERA LICENSING LLC**

/s/ Holly Engelmann (with permission)

Melissa R. Smith
Texas State Bar No. 07921800
Email: melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 S. Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

Holly Engelmann
Texas State Bar No. 24040865
Email: HEngelmann@duanemorris.com
DUANE MORRIS LLP
100 Crescent Court, Suite 1200
Dallas, Texas 75201
Telephone: (214) 257-7200
Fax: (214) 257-7201

Joshua B. Long
Texas State Bar No. 24078876
Email: jblong@duanemorris.com
DUANE MORRIS LLP
1330 Post Oak Boulevard, Suite 800
Houston, TX 77056-3166
Telephone: (713) 402 3910

Brianna Vinci
Email: BVinci@duanemorris.com
DUANE MORRIS LLP
30 South 17th Street
Philadelphia, PA 19103-4196
P: +1 215 979 1198
F: +1 215 754 4983

**ATTORNEYS FOR DEFENDANT
TREND MICRO INCORPORATED**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on August 9, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant

Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that all counsel of record have met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ Alfred R. Fabricant

Alfred R. Fabricant